

Exhibit W

Page 1

1 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
2 FOR THE COUNTY OF KING
3

4 G. RUTH ALEXANDER-JONES

5 and JAMES R. JONES,

6 Plaintiffs,

7 vs.

CIVIL ACTION FILE

NO. 22-2-18669-1-SEA

8 AVON PRODUCTS, INC.,

9 et al.,

10 Defendants.
11

12 VIDEOTAPED ZOOM DEPOSITION OF
13 WILLIAM LONGO, Ph.D.

14 September 15, 2023

15 11:44 A.M.

16 Lee Ann Barnes, CCR-1852B, RPR, CRR, CRC
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25 Job No. CS6082388

1 Perhaps 150 microns?

2 A. Maybe 125, but I certainly rule --
3 wouldn't rule out 150.

4 Q. And can you give an estimate of the -- the
5 thickness of this bundle based on the micron bar?

6 A. I would say about 10 microns.

7 Q. And so this is -- what we're looking at
8 is -- is chrysotile much larger than the SG-210
9 Calidria standard that you talked about today and
10 certainly in other -- other depositions where we've
11 talked about the Calidria standard; correct?

12 A. Excuse me. I've decided to choke myself
13 to death after that question with this Red Bull.
14 Just kidding.

15 Yeah, this fits more along on the RG144
16 size, but, you know, I don't know how many
17 structures we have in here. But the size is what it
18 is. The ones I grabbed were -- I didn't just
19 pick -- just pick random ones and -- and did that.
20 In fact, I'm going to have to add these in, too.

21 Q. Well, were these chosen by you or were
22 they chosen by Paul Hess?

23 A. These actual analysis?

24 Q. The -- the -- the photomicrographs that
25 made it into this report.

1 A. Oh, these were chosen by Paul Hess.

2 Q. Yeah.

3 I mean, he was the one looking under the
4 microscope and identifying the particles that were
5 ultimately photographed; right?

6 A. Correct. I mean, I -- I don't involve him
7 on what size is and what's this, what's that. I
8 just tell him to analyze what's present.

9 Q. Okay. So let's go just look at a couple
10 of more here.

11 Well, this one, this is on page 90 of
12 Exhibit 15. It's -- it's hard to see but if you --
13 the -- the -- I presume the points of the arrows
14 give you some idea about the length of the particle;
15 right?

16 A. Excuse me. Yes.

17 Q. Okay. And so here again we're talking
18 about a particle that's roughly 100 microns;
19 correct?

20 A. Roughly.

21 Q. And just skip ahead. I mean, in some
22 there -- there are a few that are smaller.

23 A. Oh, go back. They've got some small ones
24 in there.

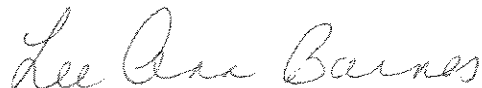
25 Q. Yep.

C E R T I F I C A T E

STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages represent a true, complete, and correct transcript of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case.



LEE ANN BARNES, CCR B-1852, RPR, CRR, CRC